

March 16, 2004

Ms. Pamela B. Katz
Chairman
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 272 - Middletown-Norwalk 345kV Transmission Line

Dear Ms. Katz:

This letter provides the response to requests for the information listed below.

This filing completes all the requested information for the TOWNS-01 set of interrogatories.

Response to TOWNS-01 Interrogatories dated 01/28/2004
TOWNS - 032

Very truly yours,

Anne B. Bartosewicz
Project Director - Transmission Business

ABB/tms
cc: Service List

Witness: Cyril J. Welter
Request from: Connecticut Siting Council

Question:

Regarding the August 2003 "Middletown to Norwalk 345-kV Transmission Line Project Highway Corridor Study."

- a. Provide copies of the correspondence between CL&P/UI and Burns & McDonnell related to this study.
- b. Provide the workpapers for this study.
- c. Provide copies of any analyses, assessments, or evaluations prepared as part of this study.
- d. The statement is made in several places in this study that transition stations would require 2-4 acre sites. Please state whether this assumes the use of solid dielectric or HPFF cable.
- e. Provide the source documents and workpapers for the evaluation of the Interstate 91 Route from Black Pond Junction to Beseck Substation corridor.
- f. Provide the source documents and workpapers for the evaluation of the Interstate 91 Beseck Substation to New Haven corridor.
- g. Provide the source documents and the workpapers for the evaluation of the possible underground route in New Haven.
- h. Provide copies of the source documents and workpapers for the evaluation of the Interstate 95 corridor.
- i. Provide copies of the source documents and workpapers for the evaluation of the Wilbur Cross/Merritt Parkway corridor.

Response:

a. & b. This interrogatory is overly broad, unduly burdensome and goes beyond reasonable discovery and long-standing practice in Siting Council proceedings. Under the Uniform Administrative Procedure Act, a party has the opportunity to "inspect and copy relevant and material records, papers and documents not in the possession of the party or such agency, except as otherwise provided by federal law or any other provision of the general statutes..." Conn. Gen. Stat. § 4-177c(1) (emphasis added). CL&P and UI object to this interrogatory to the extent that the interrogatory does not seek relevant and material information. Accordingly, without waiving this objection, CL&P and UI are answering this interrogatory to the extent the interrogatory seeks information that will assist the Siting Council in determining whether the statutory criteria for granting a certificate of environmental compatibility and public need have been met in this proceeding.

c. There are no additional analyses, assessments, or evaluations other than those presented in the report.

d. The acreage given for the size of the transition stations was for either solid dielectric or HPFF cable.

e., f., g. & h. The primary source documents were aerial photographs, USGS maps, and right-of-way drawings of the highways obtained from the Connecticut Department of Transportation (CDOT). Field reconnaissance was also part of the effort. The aerial photographs and USGS maps are provided in the Application. CDOT right-of-way drawings are public documents that can be obtained at the CDOT.

i. The source documents were aerial photographs and field reconnaissance. The initial investigation using these sources indicated greater challenges associated with right of way constraints, as compared to the other highway routes being considered. The Merritt Parkway is designated a National Scenic Byway by the Federal Highway Administration. For these reasons, this route did not receive additional consideration.

Subsequent to filing the application, questions were raised at Connecticut Siting Council sponsored Public Hearings on the use of the Merritt Parkway as a possible overhead or underground route. As a result of these questions, a detailed study that explores the possibilities of the Merritt Parkway as a route is currently be developed. This study will be complete by March 31, 2004. Drawings have been obtained from the Connecticut Department of Transportation and additional field reconnaissance has been performed.